

UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

IN RE: )  
 )  
John Reeves ) CASE NO. 13-01101-FJO-7  
Kathleen Reeves )  
 )  
Debtors. )

**AMENDED MOTION TO REDEEM PROPERTY AND**  
**NOTICE OF OBJECTION DEADLINE**

The debtor(s) hereby move(s) the Court, pursuant to 11 U.S.C. §722, for an order permitting the debtor(s) to redeem an item of tangible personal property from a lien securing a dischargeable consumer debt.

1. The item(s) of personal property involved are a Washer/Dryer Unit.
2. The debtor(s) originally purchased the property on or about 12/2010 and the original price was \$1,903.00
3. The debtor(s) have not obtained an appraisal; and believe the fair market value of the property to be \$500.00
4. The security interest of Capital One/Best Buy in the property is a dischargeable consumer debt.

**PLEASE TAKE NOTICE THAT** any objection must be filed with the Bankruptcy Clerk within 21 days of the date of this notice [or such other time period as may be permitted by Fed.R. Bankr.P 9006(f)]. Those not required or not permitted to file electronically must deliver any objection by U.S. Mail, courier, overnight/express mail, or in person at:

Indianapolis  
116 US Courthouse  
46 E Ohio St.  
Indianapolis, IN 46244

The objecting party must ensure delivery of the objection to the party filing the motion. **If an objection is NOT timely filed, the requested relief may not be granted.**

WHEREFORE, the debtor(s) move(s) the Court for an order permitting the debtor(s) to redeem the property by paying the creditor the proposed amount, finding that the remainder of the claim of said creditor is a dischargeable consumer debt, and granting such other relief as may be appropriate.

Respectfully submitted,

/s/ John Steinkamp  
John Steinkamp and Associates  
John Steinkamp  
5218 S. East Street, Ste. E-1  
Indianapolis, IN 46227  
(317) 780-8300  
steinkamplaw@yahoo.com

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a copy of the forgoing pleading was served on the following by US Mail, first class postage paid and/or via ECF on July 8, 2013

Bass & Associates, P.C.  
C/O Capital One/Best Buy  
3936 E. Ft. Lowell Rd. Suite 200  
Tucson, AZ 85712

Phillip A. Pluister, Partner  
Burke Costanza & Carberry LLP  
9191 Broadway  
Merrillville, IN 46410

William Tucker, Chapter 7 Trustee

Nancy Gargula, US Trustee

/s/ John Steinkamp  
John Steinkamp  
John Steinkamp and Associates  
5218 S. East Street, Ste. E-1  
Indianapolis, IN 46227  
(317) 780-8300  
steinkamplaw@yahoo.com